



NATIONAL PARK SERVICE ENVIROFACTS

3/3/99

National Park Service
Hazardous Waste Management &
Pollution Prevention Team
Washington DC 20240
(202)565-1240(x3)

HAZARDOUS WASTE GENERATOR STATUS DETERMINATION

DEFINITIONS

Large Quantity Generator (LQG): A park that generates more than 1000 kg (2200 lbs.) of hazardous waste per month.

Small Quantity Generator (SQG): A facility that generates more than 100 kg (220 lbs.) and up to 1000 kg of hazardous waste and/or 1 kg (2.20 lbs.) of acutely hazardous waste per month and accumulates less than 6000 kg at any one time.

Conditionally Exempt SQG (CESQG): A park that generates less than 100 kg (220 lbs.) of hazardous waste and/or 1 kg (2.20 lbs.) of acutely hazardous waste per month.

Treatment, Storage, and/or Disposal

Facility (TSDF): A park permitted to receive hazardous waste generated by other facilities and treat, store, or dispose of that waste.

APPLICABLE STANDARDS

Federal: The US Environmental Protection Agency (EPA) Resource Conservation and Recovery Act (RCRA) program, according to 40 CFR Parts 262, 265, and 268.

State: Some states may add additional recordkeeping requirements or modify the definition of LQG, SQG, and CESQG. For example, the amount of waste a CESQG may accumulate onsite may be significantly restricted. In other states, there may be time limits for "satellite" accumulation.

Note: Importers and exporters of waste to or from the US face additional requirements. Additional requirements also apply if the waste is treated or stored onsite in tanks.

CONDITIONALLY EXEMPT SQGS

Parks that qualify as CESQGs do not have to obtain an EPA ID number, manifest their waste, or comply with the other requirements in 40 CFR 262. However, they must ensure delivery of all hazardous waste to a permitted TSDF for treatment or disposal. Therefore, as a good management practice, parks should obtain an EPA ID number and manifest all hazardous waste even if a CESQG.

Other regulations, such as Department of Transportation (DOT) rules, still govern the

packaging and shipment of wastes, even for CESQGs.

SMALL QUANTITY GENERATORS (SQGs)

Parks that qualify as SQGs must comply with the following requirements:

- Obtain a RCRA identification number (EPA ID) from EPA or the state that manages the program.
- Characterize all waste streams to determine if they are hazardous.
- Fill out a hazardous waste manifest (supplied by EPA or state) for all hazardous waste shipped from the facility.
- Mark all containers for managing hazardous waste (see accumulation).
- Package, label, and placard all waste shipments according to US Dept. of Transportation (DOT) requirements.
- Keep appropriate RCRA records.
- Train personnel on proper waste handling procedures.
- Perform minimal emergency response planning.
- Comply with the Accumulation Rules described in a later section.
- List of emergency procedures and contacts [40 CFR 262.34(d)(4)&(5)].

LARGE QUANTITY GENERATORS (LQGs)

Parks that qualify as LQGs must meet the same requirements as SQGs plus the following items:

- More extensive training;
- Secondary containment at the hazardous waste accumulation area that equals the volume of the largest container or 10% of the total volume stored, whichever is greater;
- More emergency response planning, including development of a Contingency Plan;
- Biennial reporting to the EPA; and
- Weekly inspections of accumulation areas.

ACCUMULATION RULES

Within 90 days after filling a hazardous waste container, LQGs must manifest the waste and remove it from the site.

SQGs may keep waste onsite in accumulation areas up to 180 days (or longer, under special circumstances).

Detailed labeling and recordkeeping is required to demonstrate that the accumulation time limits are being met, and LQGs must inspect accumulation areas.

SATELLITE ACCUMULATION AREAS

Generators can accumulate up to 55 gallons of hazardous waste or one quart of acutely hazardous waste at or near the point of generation before the manifesting and accumulation time clock begins.

These areas are called "satellite" accumulation or collection areas. The container must be labeled, however, and once it is filled it must be moved to an accumulation area within 3 days.

Satellite areas must be designated. If the container is maintained in the park's hazardous waste accumulation area, the 90 day clock begins when the container begins to be filled.

GOOD PRACTICES

Maintain an inventory of the type and quantity of all waste that is generated (even non-hazardous items) to determine and provide ongoing verification of your status (LQG, SQG, etc.). The attached inventory worksheet is intended to be used to gather and organize this important information.



CESQGs should manage their waste in accordance with SQG requirements for packaging, handling, and accumulation onsite. In some cases, a CESQG may decide to simply register as a SQG and conform to those requirements.

All parks should evaluate their TSDFs to minimize liability.

ENVIROFACTS X-REFERENCES

- Environmental Training Requirements
- Hazard Communication
- Spill Response and Reporting

